

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
WINCHESTER DIVISION**

**SKYMONT FARMS, DUSTY)
WANAMAKER, ANTHONY WANAMAKER)
AND CATRENIA WANAMAKER,)**

Plaintiffs,

v.

**SUZANNE NORTH, INDIVIDUALLY;)
CINDY ANDERSON, INDIVIDUALLY;)
RICHARD MACKIE, INDIVIDUALLY;)
SUZANNE NORTH DBA SUMMITVILLE)
CROP INSURANCE AGENCY; CINDY)
ANDERSON DBA SUMMITVILLE CROP)
INSURANCE AGENCY; RICHARD)
MACKIE DBA SUMMITVILLE CROP)
INSURANCE AGENCY; AND)
SUMMITVILLE CROP INSURANCE)
AGENCY,)**

Defendants.

**Civil Action No: 4:09-cv-00077
JURY DEMANDED**

**Removed from Circuit Court
of Grundy County, Tennessee
No. 8127**

**DEFENDANTS', SUZANNE NORTH, CINDY ANDERSON AND SUMMITVILLE
CROP INSURANCE AGENCY'S RULE 26(a) INITIAL DISCLOSURES**

COME NOW Defendants, SUZANNE NORTH, CINDY ANDERSON and SUMMITVILLE CROP INSURANCE AGENCY, and file their Initial Disclosures as required by Federal Rule of Civil Procedure 26(a)(1)(A) and would show unto the Court as follows:

(i) The names, addresses and telephone numbers of individuals likely to have discoverable information, along with the subjects of that information that may be used to support claims or defenses:

Suzanne North
c/o Summitville Crop Ins. Agency
219 Clark Rd.
Summitville, TN 37382
Phone: 931-728-0303

Cindy Anderson
c/o Summitville Crop Ins. Agency
219 Clark Rd.
Summitville, TN 37382
Phone: 931-728-0303

Richard Mackie
530 Glade Creek Rd.
Sparta, TN 38583
931-935-2904

Dusty Wanamaker, Anthony Wanamaker, Catrenia Wanamaker

Federal Crop Insurance Corporation

Risk Management Agency

United States Department of Agriculture

NAU Country Insurance Company

Cindy Anderson and Suzanne North are insurance agents with Summitville Crop Insurance Agency, and they would have knowledge about any crop insurance policy to Dusty Wanamaker for the crop year 2006. Richard Mackie was formerly an agent with Summitville Crop Insurance Agency and initially sold crop insurance policies to Mr. Wanamaker. These persons would have knowledge about the application process and any conversations or discussions regarding the policies of insurance made the basis of Plaintiff's claims. NAU and the other entities noted above are Defendants in another Federal lawsuit filed by Plaintiffs regarding the same policy and would have information regarding the denial of coverage under the policy and the reasons therefore. Plaintiffs Dusty Wanamaker, Anthony Wanamaker and Catrenia Wanamaker would also have knowledge regarding these matters as well.

(ii) Copies of documents to support claims or defenses:

Copy of the Summitville Crop Insurance Agency file regarding the crop insurance policy made the basis of this lawsuit will be provided.

(iii) Computation of damages claimed:

Defendants have no documents regarding Plaintiffs' computation of damages other than what might be contained in the claim file regarding the applications submitted to Summitville Crop Insurance Agency for the policy issued by NAU.

(iv) Insurance agreement:

A copy of the insurance agreement will be produced.

Respectfully submitted,

HALL, BOOTH, SMITH & SLOVER, P.C.

By: s/ Charles E. Moody
Charles E. Moody (BPR #011068)
The Tower
611 Commerce Street, Suite 3000
Nashville, Tennessee 37203
(615) 313-9911

*Attorneys for Defendants, Suzanne North,
Cindy Anderson and Summitville Crop
Insurance Agency*

CERTIFICATE OF SERVICE

Notice has been electronically mailed, via the CM/ECF system to:

Gregory W. Callaway, Esq.
Howell & Fisher PLLC
Court Sq. Bldg.
300 James Robertson Pkwy.
Nashville, TN 37201-1107

Attorneys for Co-Defendant, Richard Mackie

Notice has been delivered by mailing a true and correct copy of same, postage prepaid to:

Stephen E. Neal, Esq.
White Peck Carrington, LLP
P. O. Box 950
Mt. Sterling, KY 40353

Attorneys for Plaintiff

on this the 4th day of December, 2009

HALL, BOOTH, SMITH & SLOVER, P.C.

By: s/ Charles E. Moody
Charles E. Moody